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AUGUST 3, 2016

The Honorable J. Paul Oetken  
United States District Court for the Southern District of New York

Re: Williams v. City of N.Y. et al., No. 16 Civ. 233 (JPO)

Dear Judge Oetken:

I represent Plaintiff Rhonda Williams in the above-captioned Section 1983 police misconduct litigation which alleges false arrest, fabrication of evidence and more.

This morning the Parties attended a mediation pursuant to Local Rule 83.10 which was unfortunately unsuccessful. The mediator has offered to make herself available to the Parties via telephone in the coming weeks in the event the Parties think that additional conversations with her would be productive.

I write to respectfully request that the Court schedule an initial conference at its earliest convenience. In addition to obtaining the typical pretrial guidance, Plaintiff would like to address pleading amendment so that she can identify certain Doe Defendants, among other things. As Ms. Williams's statute of limitations runs on or about September 10, 2016, I respectfully ask that the conference be scheduled prior to that date if that is feasible. I will file a status report in advance of the conference, and with that report I will include a copy of a Proposed First Amended Complaint along with Defendants' position relative to its becoming the operative pleading.

I conferred with Ms. Katherine Byrns, Defense counsel, and we are both available on September 1, 2 or 6, if any of those dates suit the Court.

Thank you for your time. I am happy to provide additional information upon request.

Sincerely,

A handwritten signature in blue ink that reads 'Ryan Lozar'.

Ryan Lozar  
Attorney for Plaintiff Rhonda Williams